

1 MICHAEL STEPANIAN  
2 Attorney at Law (CSBN 037712)  
3 819 Eddy Street  
San Francisco, CA 94109  
Telephone: (415) 771-6174  
Facsimile: (415) 474-3748

RANDY SUE POLLOCK  
Attorney at Law (CSBN 64493)  
2831 Telegraph Avenue  
Oakland, CA 94609  
Telephone: (510) 763-9967  
Facsimile: (510) 272-0711

8 | Attorneys for Defendant Shannon Blaylock

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

—000—

13 UNITED STATES OF AMERICA,  
14 Plaintiff,  
15 vs.  
16 SHANNON BLAYLOCK, et al.,  
17 Defendant  
18 ) No. CR 07-0454 PJH  
 )  
 ) **EX PARTE APPLICATION TO PERMIT  
 LATE FILING OF DEFENDANT'S  
 OPPOSITION TO GOVERNMENT'S  
 OMNIBUS MOTION IN LIMINE;  
 DECLARATION OF COUNSEL; PROPOSED  
 ORDER**  
 )  
 )  
 /

19 Defendant Shannon Blaylock, by and through his counsel of record Randy Sue Pollock, hereby  
20 applies for an Order permitting the late filing of the defense opposition to the government's omnibus  
21 motion in limine. This application is based on this application, the accompanying declaration of counsel,  
22 and the files and record in this case.

24 | Date: August 21, 2008

Respectfully submitted,

/s/ Randy Sue Pollock  
Randy Sue Pollock

**DECLARATION OF COUNSEL**

I, Randy Sue Pollock, declare and state as follows:

1. I am co-counsel for defendant Shannon Blaylock in CR. 07-00454-PJH;
  2. On August 13, 2008, the governments filed their pretrial motions and counsel did receive their Omnibus Motion In Limine as well as the Motion In Limine that was filed *under seal*;
  3. Unfortunately due to counsel's oversight, the opposition to the government's Omnibus Motion in Limine was inadvertently not filed yesterday as required;
  4. The government has no objection to this late filing.

I declare under penalty of perjury that the above is true and correct to the best of my knowledge.  
Executed this 21<sup>st</sup> day of August, 2008 in Oakland, CA.

/s/ Randy Sue Pollock  
RANDY SUE POLLOCK

1 MICHAEL STEPANIAN  
2 Attorney at Law (CSBN 037712)  
3 819 Eddy Street  
San Francisco, CA 94109  
Telephone: (415) 771-6174  
Facsimile: (415) 474-3748

RANDY SUE POLLOCK  
Attorney at Law (CSBN 64493)  
2831 Telegraph Avenue  
Oakland, CA 94609  
Telephone: (510) 763-9967  
Facsimile: (510) 272-0711

8 | Attorneys for Defendant Shannon Blaylock

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

-000-

13 UNITED STATES OF AMERICA, ) No. CR 07-0454 PJH  
14 Plaintiff, )  
15 vs. ) [PROPOSED] ORDER TO PERMIT LATE  
16 SHANNON BLAYLOCK, et al., ) FILING OF DEFENDANT'S OPPOSITION TO  
17 Defendant ) GOVERNMENT'S OMNIBUS MOTION IN  
18 / LIMINE; DECLARATION OF COUNSEL

19 GOOD CAUSE SHOWN, based on the application and declaration of counsel for defendant  
20 SHANNON BLAYLOCK, IT IS HEREBY ORDERED that defendant's application for a one day  
21 extension until August 21, 2008, to file their opposition to the government's omnibus motion in limine  
22 is GRANTED/DENIED

24 || Date: 8/26/08

